

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.)
)
EDER D. COELHO, a/k/a)
EDVARDO VIANA LUCAS, a/k/a)
LEVAN DE CHANTAL and)
ABRAO A. OLIVEIRA, a/k/a)
ABRAAO ALVES DE OLIVEIRA a/k/a)
KEVIN BRAY,)
Defendants.)

Crim. No. 03-10376-PBS

FILED
In Open Court
USDC, Mass.
Date 6-21-04
By GD
Deputy Clerk

GOVERNMENT'S MOTION PURSUANT TO U.S.S.G. §3E1.1
(EDER D. COELHO)

The United States, by and through Michael J. Sullivan,
United States Attorney, and the undersigned Assistant United
States Attorney, hereby moves, pursuant to section 3E1.1(b) of
the United States Sentencing Guidelines, that in addition to
finding that Defendant Eder D. Coelho has accepted responsibility
for his conduct, the Court further reduce Defendant's Guidelines
Total Offense Level by a third point. In support therefor, the
government states that Defendant has assisted authorities in the
prosecution of his case by giving timely notification of his
intention to enter a guilty plea, thereby permitting the
government and the Court to allocate their resources efficiently.

Respectfully submitted,
MICHAEL J. SULLIVAN

By:

Gregory Moffatt
Assistant U.S. Attorney
617-748-3370

DATED: June 21, 2004

CERTIFICATE OF SERVICE

I, Gregory Moffatt, do hereby certify that I served a copy of the foregoing pleading by hand-delivery on January 20, 2004 on counsel for defendant Eder D. Coelho, Melvin Norris, Esq., 260 Boston Post Road, Suite 9, Wayland, Massachusetts, 01778, by hand-delivery this 21st day of June 2004.


GREGORY MOFFATT
Assistant U.S. Attorney